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April 21, 2021

Via ECF Filing

Hon. Vincent S. Broderick
United States District Judge
500 Pearl Street
New York, New York 10007

APPLICATION GRANTED

SO ORDERED 

VERNON S. BRODERICK

U.S.D.J. 4/21/2021

Re: *United States v. Maria Lopez*
20 Cr. 493 (VSB)

Dear Judge Broderick:

I represent Maria Lopez in the above-referenced matter. Ms. Lopez presently is released on bail consisting principally of a \$200,000 PRB co-signed by 3 financially responsible persons, surrender of travel documents and with travel limited to the EDNY, SDNY, Middle District of Florida (where she presently resides) and points in between for transit only. Ms. Lopez has been in full compliance with the conditions of her release.

I write now to request that Ms. Lopez's bail conditions be modified to include the State of Pennsylvania. The reason for this request is that Ms. Lopez and her family will be moving shortly to Downingtown, Pennsylvania (in the Eastern District of Pennsylvania) in order to better accommodate her medical/surgical needs. Ms. Lopez has located a surgeon in Pennsylvania who is able to perform a needed delicate surgical procedure. She and her family have rented a home in the area and expect to relocate within the next few days.

Accordingly, I respectfully request that Ms. Lopez's bail conditions be modified to include the State of Pennsylvania. Neither the Government nor Pretrial Services objects to this modification. Thank you for the Court's consideration of this application.

Respectfully submitted,

/s/

John F. Kaley

cc: AUSA Daniel Nessim
Pretrial Services Officer Ebonie Henderson
(both via email)